

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

In re: :

JAMES A. CITRO  
DEIRDRE FOLEY-CITRO

Debtor(s)

: Bankruptcy No. 17-12122SR

: Chapter 13

\* \* \* \* \*

**HEARING TO BE HELD:**

**Date: September 20, 2017**

**Time: 10:00 a.m.**

**Place: United States**

**Bankruptcy Court**

**Courtroom #4**

**900 Market Street**

**Philadelphia, PA 19107-4295**

\* \* \* \* \*

TRUSTEE'S MOTION TO DISMISS PURSUANT TO 11 U.S.C. SECTION 1307

To the Honorable Judges of the United States Bankruptcy Court for the Eastern District of Pennsylvania:

1. Your Movant is Frederick L. Reigle, Esq. the duly qualified and acting Chapter 13 Trustee in the above-captioned case.
2. The within case was commenced by the filing of a Chapter 13 petition on 3/28/17.
3. This Motion to Dismiss has been filed for the following reason(s):
  - At the time of the first meeting of creditors, the Debtor(s) was/were directed to file an amended plan to comply with 11 U.S.C. Section(s) 1322 and/or 1325. No amended plan has been filed.
  - The plan does not appear to be feasible.
  - The Debtor(s) own(s) real property on which there is no property or liability insurance. The properties include, but are not necessarily limited to, the following: 1720 Sammar Road, Lancaster, PA 17601
4. For the reasons set forth herein, the Trustee believes, and therefore avers, that the within case should be dismissed.

WHEREFORE, the Movant requests that the Court, after a hearing, enter an Order dismissing this case.

Respectfully submitted,

Date: September 1, 2017

*/s/ Polly A. Langdon*

Polly A. Langdon, Esq.  
for  
Frederick L. Reigle, Esq.  
Standing Chapter 13 Trustee  
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